



United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

April 18, 2016

VIA ECF

The Honorable P. Kevin Castel
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Am. Civil Liberties Union et al. v. U.S. Dep't of Justice et al.*,
15-cv-9002 (PKC)

Dear Judge Castel:

This Office represents the United States Department of Justice in the above-referenced FOIA action. I write respectfully to request that the Court extend the Government's time to file its reply and opposition to Plaintiffs' cross motion for summary judgment by ten days from April 25, 2016, to May 5, 2016. The Government has not sought or received an earlier extension of its reply deadline, and the plaintiffs consent to the extension. If the Court grants the requested extension, it will affect the other deadlines in this matter, and therefore, the Government has attached a proposed revised Scheduling Order for the Court's consideration.

The Government requests the additional time to finalize its filings in this case, and to complete the necessary intra-Government review and coordination.

We thank the Court for its consideration of this letter motion.

Respectfully,

PREET BHARARA
United States Attorney for the
Southern District of New York

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